

requirements similar to those imposed upon creditors under the Truth in Lending Act and Fair Credit Billing Act.⁵³ This also would add clarity to the expectation for companies with billing responsibilities. Either timeframe would be ample for the notice and processing guidelines already specified in the proposed rules of the FCC and FTC.

IX. Conclusion

For the foregoing reasons, IIA urges that the Commission take a broad view of the measures necessary to preserve the integrity of pay-per-call services and protect the interest of consumers. The public interest will best be served by regulations that create an environment that promotes consumer education, respect for the First Amendment and preserves the viability of the dynamic and diverse pay-per-call marketplace.

Respectfully submitted,
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